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**From:** Fennessy, Christopher [christopher.fennessy@Rocket.com]  
**Sent:** 5/1/2018 4:01:19 PM  
**To:** Keller, Lynn [Keller.Lynn@epa.gov]  
**Subject:** RE: [EXTERNAL] EPA Draft AR A40 FS comment ltr 30Apr2018 signed.pdf

Thanks!

**Christopher M. Fennessy, P.E.**  
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**From:** Keller, Lynn [mailto:Keller.Lynn@epa.gov]  
**Sent:** Monday, April 30, 2018 4:34 PM  
**To:** Fennessy, Christopher  
**Cc:** MacDonald, Alex@Waterboards (Alex.MacDonald@waterboards.ca.gov); MacNicholl, Peter@DTSC; Tom.Lae@CH2M.com  
**Subject:** [EXTERNAL] EPA Draft AR A40 FS comment ltr 30Apr2018 signed.pdf

Hi, Chris.

Attached please find EPA's comments on the Draft Aerojet Area 40 FS:

The final ARAR list in the FS is contingent on what the attorneys decide between EPA, DTSC, and Water Board. Larry Bradfish has incorporated my substantive ARAR comments—I defer to him on the legal interpretation of which ARARs need to be included in the FS. Last update I have is that Larry sent his second round of ARAR list comments to Isabella and David on 25 Apr for their review.

I realize there are a lot of comments in this letter, but most pertain to the risk presentation, since the FS and HHERA overlapped. The overall remedy approach is sound and well supported. Please have your team prepare a written response to comments to help facilitate finalization of this FS. We can set up a conference call to go over RTCs if that would help.

Thank you,  
Lynn

*Lynn M. Keller, EI, PMP*  
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